

EXHIBIT 3

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10 AVIATION, INC.

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13

14 Renaldo Navarro,

15 Plaintiff,

16 vs.

17 Menzies Aviation, Inc., DOING BUSINESS AS
18 MENZIES; and DOES 1 through 10, inclusive,

19 Defendants.

Case No. 3:19-cv-8157

DECLARATION OF JOHN QUALLY

State Court Action Filed: 10/23/19

Action Removed: December 16, 2019

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DECLARATION OF JOHN QUALLY
Case No. 3:19-cv-8157

DECLARATION OF JOHN QUALLY

I, John Qually, declare as follows:

1. I am employed by Menzies Aviation as a Duty Manager for the Company's operations at San Francisco International Airport ("SFO"). I have been employed by either Menzies or a predecessor business known as ASIG at SFO since approximately 2005 and have held my current position as Duty Manager for approximately four years. I have personal knowledge of the facts contained in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. In the August 2018 time period, I typically worked the morning shift and would take the handoff for my responsibilities from employees coming off the graveyard shift. As a consequence, I did not often work directly with Plaintiff Renaldo Navarro and most of my interactions with him occurred during this "handoff" between the graveyard and morning shifts. Because Plaintiff worked the graveyard shift and I handled the morning shift, I was asked by Menzies to notify Plaintiff that he had been suspended in August 2018 pending an investigation.

3. After I notified Plaintiff of the suspension on or about August 23, 2018, I immediately prepared a written statement summarizing what I remembered as the information communicated to Plaintiff by me during that interaction. After preparing that statement, I provided it to Menzies management for inclusion in the investigation records. A true and correct copy of the written statement I prepared is attached hereto as **Exhibit 23**.

I declare under penalty of perjury under the laws of the States of California, and the laws of the United States, that the foregoing is true and correct.

Executed on October 14, 2020 at Burlingame, California.


John Qually